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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JESSIE C. MALLONEE,

Plaintiff,

v.

KILOLO KIJAKAZI,  
 Acting Commissioner of Social Security,

Defendant.

Case No.: 2:23-cv-00205-VCF

**UNOPPOSED MOTION FOR  
 EXTENSION OF TIME  
 (FIRST REQUEST)**

Defendant, the Commissioner of Social Security, respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Dkt. No. 16, filed on May 8, 2023), currently due on June 7, 2023, by 28 days, through and including July 5, 2023.

Defendant further requests that all subsequent deadlines be extended accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension due to Defendant's counsel's workload, as described below. In the span of six workdays, Defendant's counsel has nine briefing deadlines, including this matter. In May 2023, counsel completed numerous

1 other briefing assignments, including two Ninth Circuit answering briefs. Although counsel has  
2 exercised due diligence, the requested additional time is necessary.

3 Additional time is required to review the record, to evaluate the issues raised in Plaintiff's  
4 motion, to determine whether options exist for settlement, and if not, to prepare Defendant's response  
5 to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as possible.  
6 This request is made in good faith and with no intention to unduly delay the proceedings, and counsel  
7 apologizes for any inconvenience.

8 On June 1, 2023, counsel for Defendant conferred with Plaintiff's counsel, who has no  
9 opposition to this motion.

10 It is therefore respectfully requested that Defendant be granted an extension of time to respond  
11 to Plaintiff's Motion for Reversal and Remand, through and including July 5, 2023.

12  
13 Dated: June 1, 2023

Respectfully submitted,

14 JASON M. FRIERSON  
15 United States Attorney

16 /s/ Michael J. Mullen  
MICHAEL J. MULLEN

17 Special Assistant United States Attorney  
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21 IT IS SO ORDERED:

22   
UNITED STATES MAGISTRATE JUDGE

23 DATED: 6-2-2023  
24 \_\_\_\_\_  
25  
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**CERTIFICATE OF SERVICE**

I, Michael J. Mullen, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** (*FIRST REQUEST*) on the date, and via the method of service, identified below:

**CM/ECF:**

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Attorney for Plaintiff

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Attorney for Plaintiff

Dated: June 1, 2023

*/s/ Michael J. Mullen*  
MICHAEL J. MULLEN  
Special Assistant United States Attorney